

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff

v.

CIVIL ACTION No. 3:16-cv-27 TSL-RHW

REAL PROPERTY LOCATED AT
19 CRANE PARK, HATTIESBURG, LAMAR COUNTY,
MISSISSIPPI WITH ALL APPURTENANCES,
IMPROVEMENTS AND FIXTURES THEREON, ET AL.,
Defendant Property

**CLAIMANT THOMAS E. SPELL, JR.'S STIPULATION TO USA'S MOTION TO
AMEND THE VERIFIED COMPLAINT & MOTION TO STAY PROCEEDINGS**

(1) Claimant Thomas E. Spell, Jr., by and through his undersigned counsel, hereby stipulates that it will not oppose the Government's motion for leave to amend its verified complaint [Doc. # 174].

(2) Mr. Spell also withdraws his objection and stipulates to the Government's motion to stay [Doc. # 146], which is also the subject of the Court's Order [Doc. # 172] on Mr. Spell's motion for reconsideration.

(3) Mr. Spell and the Government have agreed that these stipulations moot Mr. Spell's motion to dismiss [Doc. # 160] and the Government's outstanding special interrogatories [Doc. # 173].

(4) This stipulation is made subject to and without waiver of any defenses, affirmative or otherwise, to the Government's proposed Amended Complaint in this action.

This the 26th day of January, 2017.

RESPECTFULLY SUBMITTED,

THOMAS E. SPELL, JR.

/s/ Stefan D. Cassella (pro hac vice)

/s/ James M. Tyrone

James M. Tyrone

OF COUNSEL :

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to all counsel of record:

This the 26th day of January, 2017.

s/ James M. Tyrone

James M. Tyrone